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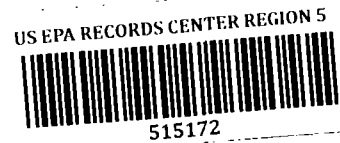
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September 11, 1984



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Re: United States of America, et al. vs.
Reilly Tar & Chemical Corporation, et al.
Civil File No. 4-80-469

Dear Counsel:

Enclosed and hereby served upon you by United States mail please find the Request of Reilly Tar & Chemical Corporation to the State of Minnesota and the City of St. Louis Park to Supplement Interrogatory Answers.

Very truly yours,

Renee Pritzker

RBP:ph
Enclosures
cc: ✓ Robert Leininger, Esq. (enc.)
Paul Zerby, Esq. (enc.)

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

UNITED STATES OF AMERICA,

Civil No. 4-80-469

Plaintiff,

and

STATE OF MINNESOTA, by its
Attorney General Hubert H.
Humphrey III, its Department
of Health, and its Pollution
Control Agency,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION;
HOUSING AND REDEVELOPMENT AUTHORITY
OF ST. LOUIS PARK; OAK PARK VILLAGE
ASSOCIATES; RUSTIC OAKS CONDOMINIUM,
INC.; and PHILLIP'S INVESTMENT CO.,

REQUEST OF REILLY TAR &
CHEMICAL CORPORATION TO THE
STATE OF MINNESOTA AND
THE CITY OF ST. LOUIS PARK
TO SUPPLEMENT
INTERROGATORY ANSWERS

Defendants,

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant,

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

TO: State of Minnesota, plaintiff-intervenor above-named, and its attorneys, Hubert H. Humphrey III, Attorney General, State of Minnesota, William P. Donohue, Special Assistant Attorney General, Paul G. Zerby, Special Assistant Attorney General, Dennis M. Coyne, Special Assistant Attorney General and Stephen Shakman, Special Assistant Attorney General, 1935 West County Road B2, Roseville, Minnesota 55113; and

Allen Hinderaker, Wayne Popham, and Kathleen Martin, Popham, Haik, Schnobrich, Kaufman & Doty, 4344 IDS Center, Minneapolis, Minnesota 55402, attorneys for Plaintiff-Intervenor, City of St. Louis Park and Defendant Housing and Redevelopment Authority of St. Louis Park, Minnesota.

Pursant to Rule 26(e)(1), (3) of the Federal Rules of Civil Procedure, Reilly Tar and Chemical Corporation requests the State of Minnesota and the City of St. Louis Park to supplement answers to the following interrogatories.

(1) Interrogatories 1 and 2 of Defendants' Interrogatories to Plaintiff and Intervenor (Set I) dated September 13, 1979.

(2) Subpart a. of Interrogatories 3-76, 80-82, 86 and 88, as well as Interrogatories 78(1)(1), 79(i)(1), 83(g)(1), 84(h)(1) and 85(h)(1), found in Defendants' Interrogatories to Plaintiff and Intervenor (Set I) dated September 13, 1979, which request the identification of each person who claims to have knowledge of the facts concerning the issues in the case set forth in the interrogatories. In addition to supplementing interrogatories with additional names that may have come to light, if it has been determined, since answers to the interrogatories were first filed, that individuals previously identified do not have knowledge of the facts, indicate which names should be deleted from your prior answers.

Defendants' Interrogatories to Plaintiff and Intervenor (Set I) dated September 13, 1979, and answers thereto were filed in the State court action entitled State of Minnesota and City of St. Louis Park v. Reilly Tar & Chemical Corporation, File No. 670767. The interrogatories, and answers thereto, in the State court action were made a part of the record in this action by stipulation agreement between the parties and order of Magistrate Boline dated July 13, 1981.

Reilly Tar and Chemical Corporation further requests the City of St. Louis Park to supplement the following interrogatories.

(3) Subpart b. of Interrogatories 1-17, 19-21, and 24-36 as well as the portion of Interrogatories 18, 22 and 23 which require identification of each person who has or claims to have knowledge of the facts identified in the interrogatories. If it has been determined, since answers to these interrogatories were first filed, that individuals previously identified do not have knowledge of the facts, indicate which names should be deleted from your prior answers.

Dated: September 11, 1984

DORSEY & WHITNEY

By 

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